

IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA  
Case No. 1:23-cv-00423-WO-JLW

TIMIA CHAPLIN; SARAH FIELDS;  
SAYELINE NUNEZ; THOMAS HAYWARD;  
KEVIN SPRUILL; ROTESHA MCNEIL;  
QIANA ROBERTSON; YOUSEF JALLAL;  
MESSIEJAH BRADLEY; DENNIS KEITH  
LASSITER; PAULINO CASTELLANOS;  
ROBERT LEWIS; and ALLEN SIFFORD, on  
behalf of themselves and all others similarly  
situated,

*Plaintiffs,*

v.

GARY L. MCFADDEN, officially, as the  
Sheriff of Mecklenburg County; JOHN DOE  
SURETY, as surety for the Sheriff of  
Mecklenburg County; WILLIE R. ROWE,  
officially, as the Sheriff of Wake County;  
BRIAN ESTES, officially, as the Sheriff of Lee  
County; THE OHIO CASUALTY  
INSURANCE COMPANY, as surety for the  
Sheriffs of Wake County and Lee County;  
TYLER TECHNOLOGIES, INC; RYAN  
BOYCE, officially, as the Executive Director of  
the North Carolina Administrative Office of the  
Courts; BRAD FOWLER, officially, as the  
eCourts Executive Sponsor and Chief Business  
Officer of the North Carolina Administrative  
Office of the Courts; ELISA CHINN-GARY,  
individually and officially, as the Mecklenburg  
County Clerk of Superior Court; BLAIR  
WILLIAMS, individually and officially, as the  
Wake County Clerk of Superior Court; SUSIE  
K. THOMAS, individually and officially, as the  
Lee County Clerk of Superior Court; and DOES  
1 THROUGH 20, INCLUSIVE,

*Defendants.*

**PROOF OF SERVICE**

Pursuant to Rule 4(I) of the Federal Rules of Civil Procedure, plaintiffs in the above-captioned action (“Plaintiffs”), on behalf of themselves and all others similarly situated, hereby submit as proof of service and attached as **Exhibit A** hereto, a copy of a Waiver of the Service of Summons (“Waiver”) evidencing that copies of the Second Amended Complaint [Doc. 77] and Summons [Doc. 78-1] (collectively, the “Service of Process Packet”) were served on defendant Elisa Chinn-Gary, individually and officially, as the Mecklenburg County Clerk of Superior Court, on March 11, 2024. Specifically, Plaintiffs served the Service of Process Packet on counsel for defendant Clerk Chinn-Gary who then executed the Waiver, thereby satisfying service of process on defendant Clerk Chinn-Gary. Counsel for Plaintiffs agreed to file the Waiver with the Court and hereby do so.

Respectfully submitted this the 11th day of March, 2024.

/s/ Gagan Gupta

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*Counsel for Plaintiffs on behalf of  
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## CERTIFICATE OF SERVICE

The undersigned attorney hereby certifies that the attorney is, and at all times hereinafter mentioned was, more than eighteen (18) years of age; and that on this day, copies of the foregoing will be served on the following by electronic mail or by the Court's Case Management / Electronic Case Filing ("CM/ECF") system:

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\* \* \* Additional Counsel and Signature Block Appear on Next Page \* \* \*

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*Counsel for Defendants North Carolina Administrative Office of the Courts, Ryan Boyce,  
Brad Fowler, Blair Williams, Susie K. Thomas and Elisa Chinn-Gary*

The undersigned attorney certifies under penalty of perjury that the forgoing is true and correct.

This the 11th day of March, 2024.

/s/ Gagan Gupta

Gagan Gupta (NCSB #: 53119)

*Counsel for Plaintiffs on behalf of  
themselves and all others similarly situated*